

CIPL's EU AI Act Implementation Project

# **AI Act Article 4: AI Literacy Best Practices and Recommendations for Practitioners**

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## EU Artificial Intelligence Act Implementation Project: AI Act Article 4: AI Literacy Best Practices and Recommendations for Practitioners

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The Centre for Information Privacy Leadership<sup>1</sup> is currently facilitating a two-year EU AI Act Implementation Project (Implementation Project) intended to support organisations with the operationalisation of the landmark AI Act. The project is focused on new obligations that intersect with other existing data-related regulations and laws, especially the GDPR. The learnings from this project will be shared with external stakeholders, including academics, civil society, and legislative and regulatory public bodies.

As a first part of the Implementation Project and in conjunction with ongoing CIPL research on the responsible and accountable development and deployment of artificial intelligence systems, CIPL has identified Article 4 AI literacy best practices.

The EU AI Act requirements enter into force in a staggered manner, with the first substantive requirements, including those related to AI literacy (Article 4, AI Act), coming into effect in February 2025. Article 4 of the AI Act requires providers and deployers of AI systems to take measures to ensure a sufficient level of AI literacy within their organisations and across other individuals potentially involved in the operation and use of AI systems. While it is clear *why* AI literacy is foundational to the implementation of the AI Act, the *how* remains ambiguous to many stakeholders. In this white paper, CIPL shares emerging AI literacy best practices and recommendations that can support practitioners and organisations seeking to build or evolve AI programs to promote responsible and trustworthy innovation.<sup>2</sup> The following recommendations are the result of CIPL-led research, interviews with expert practitioners, and a webinar that explored how to operationalise AI literacy requirements across the digital ecosystem.

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<sup>1</sup> The **Centre for Information Policy Leadership (CIPL)** is a global privacy and data policy think tank within the Hunton law firm that is financially supported by the firm, 85+ member companies that are leaders in key sectors of the global economy, and other private and public sector stakeholders through consulting and advisory projects. CIPL's mission is to engage in thought leadership and develop best practices for the responsible and beneficial use of data in the modern information age. CIPL's work facilitates constructive engagement between business leaders, data governance and security professionals, regulators, and policymakers around the world. For more information, please see CIPL's website at [www.informationpolicycentre.com](http://www.informationpolicycentre.com). Nothing in this document should be construed as representing the views of any individual CIPL member company or Hunton. This document is not designed to be and should not be taken as legal advice.

<sup>2</sup> **DISCLAIMER:** Nothing in this report should be considered to be legal advice. The implementation of these best practices in no way guarantees Article 4 compliance.

### **AI Literacy Best Practices:**

1. Ensure organisational leadership signals support for and prioritization of AI literacy programming.
2. Leverage and integrate AI literacy obligations in existing compliance programmes and business goals.
3. Consider an organisation’s workforce, contractors, third party vendors, clients/customers, users, and individuals affected by the organisation’s use of AI systems when developing AI literacy programs.
4. Make AI literacy an organisation-wide, shared effort to promote existing knowledge, foster new learning, and identify best practices.
5. Promote a common, organisation-wide AI taxonomy that includes an inventory of fully assessed use cases.
6. Take a contextual approach to AI literacy training that considers role, expertise, and diverse learning preferences.
7. Look beyond training by creating opportunities for stakeholders to put the knowledge into practice with support.
8. Establish a continuous feedback loop for AI literacy programming and adjust programming and training based on feedback and ongoing developments.

### **AI Literacy Best Practices for Whom?**

These best practices can be adapted and evolved depending on the size of an organisation or the extent to which it relies on AI systems. For organisations that are in nascent stages of AI adoption, this white paper provides best practices for AI literacy to support responsible and trustworthy AI initiatives. Equally, organisations that have been developing and deploying AI systems over a longer period with mature AI programs, including AI literacy programs with resources and tried and tested strategies, can profit from benchmarking against other AI literacy best practices. Considering an organisation’s use of AI (e.g., Is the tool being deployed internally or externally? Who will be interacting with and impacted by the use of the AI tool?) will shape the form AI literacy measures take.

### **What is AI literacy?**

AI literacy requires organisations that provide and deploy AI systems to ensure that their workforce and “affected persons” have the skills, knowledge, and understanding to make informed decisions about AI systems, including by taking into consideration the opportunities and risks that could arise from said use.<sup>i</sup> While there is no technical obligation under the Article 4 of AI Act to document and demonstrate a workforce’s literacy or knowledge of most AI systems, providers and deployers of high-risk AI systems are required to document and demonstrate compliance with certain AI Act obligations, and AI literacy practices may be treated as within scope of this obligation.<sup>ii</sup> Irrespective of these obligations, it is recommended for organisations to maintain documentation of AI literacy practices, programmes, and trainings in accordance with principles of transparency and accountability.

### **Who should AI literacy target?**

Article 4 of the AI Act tasks providers and deployers of AI systems with ensuring AI literacy among their “staff and other persons dealing with the operation and use of AI systems on their behalf”.<sup>iii</sup>

However, organisations should keep in mind that the AI Act obligation for “AI literacy” also requires that “affected persons” are equipped with sufficient AI literacy skills.

An AI literacy program should therefore cast a wide net and target an organisation’s **workforce** (engaging all business units, including sales teams and marketing teams), **contractors, third party vendors, clients/ customers, users, and individuals impacted** by the use of the underlying AI system.

Considering the context and use case of an AI system, some organisations are also making their AI literacy tools **publicly available** to anyone via free online courses, podcasts, and other resources like taxonomy libraries (that include known risks and their mitigations and benefits) and risk management documentation. Some organisations have also partnered with **academic institutions** (including universities and middle/ high schools) to support AI literacy upskilling initiatives.

**The role of AI literacy within organisational accountability:**

CIPL has advocated for, and provided thought leadership on, organisational accountability in data protection and broader digital and data policy for more than 20 years, including how organisations can demonstrate accountability through comprehensive data protection management programs. CIPL has been an early thought leader in AI governance, addressing the most challenging questions at the heart of AI regulation and mapping emerging best practices for an accountable approach to AI, including at the intersection of data protection laws and AI.<sup>iv</sup>



*Figure 1: CIPL's Organisational Accountability Framework*

CIPL’s Accountability Framework, contains seven core elements of accountability: leadership and oversight; risk assessment; policies and procedures (including on fairness and ethics); transparency; training and awareness; monitoring and verification; and response and enforcement (Figure 1). It is well suited to serve as a framework for accountable AI management programmes.<sup>v</sup>

AI literacy, for example, is part of the training and awareness element. AI literacy programmes ensure awareness of an organization’s AI policies and procedures, embedding them into the culture of the organization over time. They enable employees to understand how AI policies translate into their daily roles and responsibilities, and how they relate to regulatory requirements.<sup>vi</sup> Effective AI

literacy will leverage the other elements of organisational accountability to properly derive the benefits and efficiencies associated with emerging technologies such as AI systems.

### **AI Literacy Best Practices:**

#### **Sponsorship from the top:**

Direction and sponsorship from the top within an organisation is key for internal engagement with AI literacy obligations and prioritization of AI literacy programs among the workforce. This stems from a recognition that AI literacy is foundational to the secure, accountable, and responsible development and deployment of AI systems, which in turn will be conducive to business success. Trust and reliability are core to the success of any organisation, and AI literacy is key to maintaining trust among clients, customers, and users. Additionally, AI literacy will build a culture of secure and responsible AI system development and deployment within an organisation. This will reduce inappropriate use and risk, including risk to an organisation's brand. Finally, sponsorship from the top can build trust across an organisation's workforce in AI systems and foster effective prioritisation of AI literacy programs, trainings, and upskilling opportunities. A workforce that understands AI technology can drive broader innovation potential across an organisation and translate that knowledge to clients and key stakeholders to garner trust in the organisation and its products and services. Sponsorship from the top can include:

- Ensuring a thorough understanding and categorisation of all AI systems within the organisation.
- Collaborating with team leaders to organize cross-functional trainings.
- Organising periodic company-wide open meetings or workshop days with senior leadership to discuss priorities, objectives, and direction for AI literacy.
- Considering how the proper documentation and facilitation of AI literacy efforts can prepare an organisation for potential mergers and acquisitions.

#### **Leverage AI literacy in support of broader digital responsibility and compliance efforts:**

Organisations subject to Article 4 of the AI Act are likely also subject to a variety of other digital regulatory schemes, including regulations governing topics such as content and safety, data protection and privacy, cybersecurity, consumer protection, finance and banking, and competition. Meanwhile, organisations are incorporating AI systems across various business functions to drive productivity and maximise efficiencies. As such, organisations should avoid confining Article 4 AI literacy compliance to AI training. Rather, organisations should integrate their AI strategies broadly and AI literacy obligations specifically into existing programmes, strategies, plans, and processes. Organisations should ask how AI systems interact or could interact with other digital regulatory obligations and business goals and what people need to know about these interactions to achieve their goals. This integration is crucial in order to maximise the potential benefit of AI systems within existing business goals and to leverage existing programmes and trainings for AI Act compliance.

### **Make AI literacy an organisation-wide, shared effort**

Regardless of an organisation's size or organisational structure, AI literacy practices should include organisation-wide, cross departmental efforts to effectively identify AI literacy-related needs, promote existing knowledge, foster new learning, and identify best practices. Organisations have deployed various methods to engage the entire workforce in AI literacy practices, including:

- Establishing a responsible AI board (or engaging an existing internal board structure), where representatives from each business unit are encouraged to educate the board of directors and other business units about AI benefits and risks, including effective use cases and strategies;
- Identifying “AI champions” or “AI ambassadors” within the organisation who are equipped to promote learning and knowledge sharing about AI best practices and available training resources and whether any issues should be referred to leadership or specific units within the organisation;
- Hosting organisation-wide “pitch days”, where employees can promote AI-related use cases and knowledge that are relevant to the business;
- Creating mentorship programs where experienced employees can support and guide peers in applying AI solutions effectively and/ or making AI related decisions securely and responsibly; and
- Promoting internal processes for employees to anonymously flag potentially risky applications of AI and ensuring that employees are given sufficient training on the process itself.
- Creating guidelines on how to use or not use AI based on organizational principles and values.

### **Promote a common, organisation-wide AI taxonomy**

At its core, AI literacy requires key stakeholders to be able to make informed decisions about AI systems, which includes decisions related to risks and benefits. To promote AI literacy that includes awareness of relevant risks and benefits, and potential mitigations, organisations should establish an internal taxonomy for AI-related terms, risks, and benefits. This can include an internal registry that catalogues all AI models and AI systems that are relevant to an organisation and its activities, products, and services. Additionally, organisations are establishing internal inventories that provide access to fully assessed, documented, and monitored AI use cases that can support business functions and goals. Additional best practices include:

- Creating clear organisational definitions, based on existing standards or guidance, to ensure a common working language between employees; and
- Establishing a “decision tree” with clear next steps of the governance processes or risk assessment requirements depending on what falls in the scope of the organisations’ definitions. For example, a team within an organisation should be able to clearly identify whether an activity fulfils the organisation’s definition of “AI system” and have clear instructions for their next required steps (e.g., necessary risk assessments, cataloguing for the AI repository, transparency, etc.).

### **Invest in AI literacy beyond the immediate workforce**

AI literacy best practices include trainings and resources that are made available beyond an organisation's internal teams to also include clients, contractors, third party vendors, and end users. Taking a "whole-of-society" approach to AI literacy that considers all relevant stakeholders ensures that every entity in the AI lifecycle has sufficient understanding to develop or use AI systems appropriately, while being made aware of potential limitations and risks. This can include:

- Providing workshops, training sessions, and tools for third-party vendors or clients, enabling them to make informed decisions about deploying AI technologies effectively and appropriately.
- Prioritising AI literacy training among procurement, sales, and marketing teams to ensure that they have the tools and information they need to engage with clients and vendors on AI practices.
- Creating "visualization tools" that depict how AI systems work to external entities, while protecting potentially sensitive information.

### **Take a contextual approach to AI literacy training**

While many organisations already require basic ethics and compliance, many have created additional training modules specifically for AI to upskill their workforce and ensure a baseline of AI literacy. Trainings are increasingly becoming more contextual to meet the unique needs of the organisation, its employees and their respective responsibilities. For example, training may vary based on role, experience, industry, and interactions with AI tools. Furthermore, organisations should identify who within the workforce should be held most accountable for what the organisation needs and collaborate with those stakeholders to promote AI literacy tools and opportunities. This can include:

- Introducing a baseline training that targets an organisation's entire workforce, followed by targeted trainings depending on role and expertise.
- Considering diverse learning needs and preferences (e.g., offering in-person, interactive workshops vs. online, and self-paced learning modules).
- Creating a central "learning hub" for employees that houses training materials categorised by topic, employee role, and competence level, including videos, white papers, and recordings of cross-functional training events.
- Organising internal AI use case pitch days for the entire organisation.
- Prioritising the scaling of AI literacy training by starting with stakeholders that produce the largest impact to the organisation or interact most with the technology (particularly important for organisations that have limited resources for AI literacy efforts).
- Ensuring sufficient training and upskilling of the sales and marketing teams within the organisation, equipping them with the skills to understand and relay how responsible and secure AI development and deployment drive trust in customers and secure more contracts.



### **Look beyond AI literacy training**

AI literacy training must keep up with the rapid pace of AI innovation. Isolated training of independent teams or individual employees alone will not be sufficient to build a strong foundation and culture of AI literacy across the workforce. As mentioned above, engaging and incentivising the entire workforce in AI literacy practices requires signalling from the top that this is an important, organisation-wide priority. Senior leadership should ensure that the appropriate training opportunities are available, encourage collaboration between teams to increase knowledge sharing, and reduce internal siloes of communication. This can include:

- Creating opportunities to contextualize the training and put knowledge into practice (e.g., through cross-disciplinary team training, case study analyses, and creating AI project opportunities for non-AI or non-technical teams).
- Providing financial assistance to employees who want to pursue AI certifications.

### **Ensure a continuous feedback loop for AI literacy training**

It is imperative for organisations with robust AI literacy training programs to track qualitative and quantitative KPIs related to AI literacy programming, training, and resources. This will ensure that materials and knowledge will remain up to date, considering the latest developments in organisational operations, technology, and regulation. It also provides the workforce with opportunities to share feedback on what is or is not working. Finally, ongoing monitoring and auditing of AI-related decisions can help identify friction points where internal processes and governance can benefit from improvement and optimisation. Some best practices include:

- Collecting feedback from the workforce and external stakeholders (e.g., contractors, clients, customers, and users) to identify what has helped improve AI literacy or can be improved.
- Continuously monitoring developments in technology; AI-related regulation, standards, or certifications; and organisational trends.
- Adjusting AI literacy programming, training, policies, and resources based on feedback and ongoing developments.

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<sup>i</sup> 'AI literacy' means skills, knowledge and understanding that allow providers, deployers and affected persons, taking into account their respective rights and obligations in the context of this Regulation, to make an informed deployment of AI systems, as well as to gain awareness about the opportunities and risks of AI and possible harm it can cause. Article 3(56), AI Act.

<sup>ii</sup> Technical documentation, Article 11(1) & Annex IV, AI Act.

<sup>iii</sup> Providers and deployers of AI systems shall take measures to ensure, to their best extent, a sufficient level of AI literacy of their staff and other persons dealing with the operation and use of AI systems on their



behalf, taking into account their technical knowledge, experience, education and training and the context the AI systems are to be used in, and considering the persons or groups of persons on whom the AI systems are to be used. Article 4, AI Act.

<sup>iv</sup> CIPL Report, "Artificial Intelligence and Data Protection: Delivering Sustainable AI Accountability in Practice, Artificial Intelligence and Data Protection in Tension" (October 2018), available at [https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl\\_first\\_ai\\_report\\_-\\_ai\\_and\\_data\\_protection\\_in\\_tension\\_2.pdf](https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl_first_ai_report_-_ai_and_data_protection_in_tension_2.pdf). See also CIPL report, "Artificial Intelligence and Data Protection: Delivering Sustainable AI Accountability in Practice, Hard Issues and Practical Solutions" (February 2020), available at [https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl\\_second\\_report\\_-\\_artificial\\_intelligence\\_and\\_data\\_protection\\_-\\_hard\\_issues\\_and\\_practical\\_solutions\\_27\\_february\\_2020.pdf](https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl_second_report_-_artificial_intelligence_and_data_protection_-_hard_issues_and_practical_solutions_27_february_2020.pdf).

<sup>v</sup> CIPL White Paper, "Ten Recommendations for Global AI Regulation" (October 2023), available at [https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl\\_ten\\_recommendations\\_global\\_ai\\_regulation\\_oct2023.pdf](https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl_ten_recommendations_global_ai_regulation_oct2023.pdf). See also CIPL Report, "Building Accountable AI Programs: Mapping Emerging Best Practices to the CIPL Accountability Framework" (February 2024), available at [https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl\\_building\\_accountable\\_ai\\_programs\\_23\\_feb\\_2024.pdf](https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl_building_accountable_ai_programs_23_feb_2024.pdf).

<sup>vi</sup> CIPL Report, "Building Accountable AI Programs: Mapping Emerging Best Practices to the CIPL Accountability Framework" pg. 31 (Feb. 2024), available at [https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl\\_building\\_accountable\\_ai\\_programs\\_23\\_feb\\_2024.pdf](https://www.informationpolicycentre.com/uploads/5/7/1/0/57104281/cipl_building_accountable_ai_programs_23_feb_2024.pdf).